

SANTA MONICA MOUNTAINS CONSERVANCY

RAMIREZ CANYON PARK
5750 RAMIREZ CANYON ROAD
MALIBU, CALIFORNIA 90265
PHONE (310) 589-3200
FAX (310) 589-3207



April 24, 2006

Ms. Jessica Humphries
City of Santa Clarita
23920 Valencia Boulevard, Suite 300
Santa Clarita, California 91355

Notice of Preparation Comments
Mancara Residential Project, Santa Clara River
SCH No. 2006041029

Dear Ms. Humphries:

The subject 185-acre property is located along a narrow reach of the Santa Clara River and it is fully contiguous with the core habitat of the Angeles National Forest. The property is bordered on two sides by natural lands with core habitat values. The other two sides are bordered by low density residential development, open space and naturalized golf course. A broad blueline stream, Oak Spring Canyon Creek, also connects the site to the Santa Clara River. The Draft Environmental Impact Report (DEIR) must address the context of the property and how the proposed high density project is incongruous with surrounding land uses.

Proposed Residential Density and Access Road Are Incompatible with the Site

The proposed high density land use and extension of Lost Canyon Road into the subject area is antithetical both to the ecological and hydrological constraints of the land and to the City of Santa Clarita's goals of maximizing the visual and ecological capacity of the Santa Clara River.

The subject property should be limited to equivalent low density rural development and should include a large dedicated open space area. This reduced density on larger lots would allow for private driveway/road entrances. Such access results in far less ecological and visual impacts both because of its reduced width and the absence of street lighting.

The circulated Notice of Preparation (NOP) document raises many of the Conservancy's concerns about the subject project site including Critical Habitat for federally threatened California gnatcatcher, Los Angeles County Significant Ecological Area (SEA) 23 (Santa Clara River) and the presence or rapidly diminishing alluvial fan scrub habitat. The NOP also raises the many potential significant visual impacts posed by the proposed project. The key issue is how the project and its DEIR alternatives both avoid and buffer these sensitive resources.

No Acknowledgment of Wildlife Movement Corridors

The Initial Study is deficient for stating that the project could not result in negative impacts to wildlife movement corridors. The Santa Clara River is a regional wildlife corridor of Statewide significance. The proposed project would bring a range of development and human disturbances directly up to the flood plain boundary as depicted in the Initial Study. The presence of numerous ill-advised developments appressed against the flood plain downstream increases, not lessens, the importance of maintaining upland buffer area within subject property. The wildlife movement gauntlet needs to be kept wider not reduced. We urge the City to embrace this proven concept of conservation biology and require at least 300 feet of upland buffer outside of the flood plain.

In addition to the main river channel being a wildlife corridor, the site provides important habitat connectivity between the river and the habitat within the Angeles National Forest and the open space linked with the Robinson Ranch golf course. Private and public lands to the east currently provide equivalent linkage values. However, the land to the immediate east could easily be developed and fenced. The best public policy is for every property to make its commensurate contribution to local habitat linkage needs.

Modified Project and Better DEIR Alternatives

The proposed project, and every DEIR Alternative, should avoid any development or grading in the following three areas:

Area North of MTA Property along South Bank of River

No disturbance except an access road and public trails should occur in any portion of the property located north of the MTA transportation corridor. This rail corridor is a well defined boundary. The adjacent upland area that would be protected provides a key habitat node along the river before it goes into the long, narrow development gauntlet downstream until it reaches Interstate 5.

Oak Spring Canyon Creek Southwest Corner Units

No disturbance shall occur in the southwest property corner to fully protect the braided alluvial habitat and adjacent oak woodland/chaparral area. The Initial Study figure shows a proposed flood protection wall along the northern boundary of Oak Spring Canyon Creek. The proposed project shows three large lots in this area south of the proposed flood control wall. No units shall be allowed in this area. It is too sensitive and is naturally divided from the rest of the site.

Ms. Jessica Humphries - City of Santa Clarita
Notice of Preparation Comments - Mancara Residential Project
April 24, 2006
Page 3

Eastern Property Boundary Buffer Area

No disturbance along a 250-foot-wide strip along the eastern project boundary. The project lighting, fuel modification, domestic pet intrusion, and visual impacts should not extend into the adjacent parcel and another jurisdiction.

We respectfully request that the City include the following two alternative projects in the DEIR:

Conservancy Supportable Alternative

An alternative that the Conservancy could support would have no access from Lost Hills Road, no development north of the large pipeline easement through the site or in all the areas recommended for avoidance directly above. Numerous ten acre ranches could be put in this footprint and they should not need or require a secondary access because of the lot sizes and light fuel loads of the surrounding vegetation types. All undisturbed areas would have to be fully protected with conservation easements in favor of both the City and a park agency such as the Mountains Recreation and Conservation Authority (MRCA).

High Density - Moderate Ecological Avoidance Alternative

This alternative would avoid disturbance to the three areas listed above (Area North of MTA_Property along South Bank of River, Oak Spring Canyon Creek southwest Corner Units, Eastern Property Boundary Buffer Area) as stated in the descriptions. It would expand the eastern property boundary buffer strip to a minimum of 500 feet. It would also include conservation easements in favor of both the City and a park agency such as the Mountains Recreation and Conservation Authority (MRCA) over all undisturbed areas including all of Oak Spring Canyon Wash. Any and all equestrian facilities except a day time only trailhead parking lot would have to be located south of the MTA rail corridor. If no available railroad track undercrossing exists, then a trailhead would have to be located immediately north of the MTA rail corridor. Any street lighting on Lost Canyon Road located south of the MTA rail corridor shall be of the minimal standard allowed in the City and be designed to minimize light spill off the roadway to the maximum extent possible with current engineering. The cost of installing such lighting must not be a factor to dilute this requirement.

Please direct any comments and future documents to Paul Edelman of our staff at the above address and by phone at (310) 589-3200 ext. 128.

Sincerely,

ELIZABETH A. CHEADLE

Ms. Jessica Humphries - City of Santa Clarita
Notice of Preparation Comments - Mancara Residential Project
April 24, 2006
Page 4

Chairperson